

COMMENTS ON THE DRAFT REPORT

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Full comments on the draft report can be accessed in docket number A-98-05 at:

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Full comments on the draft HBHP report can be accessed through the OAR docket (see the box on the right). A summary of the comments is provided below. Comments were received from over 40 individuals and organizations and represented a wide array of perspectives.

A number of state officials acknowledged how important the indoor environment is to public health, and that increased attention and resources are needed at the state and local level in order to effect positive change. We agree with this, and hope that state and local governments, as resources permit, seriously consider implementing some of the potential actions contained in this report. In addition, EPA and others need to partner with state, local, and tribal governments as we begin to take action to improve the indoor environment. Moreover, federal and state legislators need to consider funding sources for state, local, and tribal involvement.

Several commentors wanted a more explicit recognition of the interrelationship between indoor and outdoor air pollution, and the important contribution that ambient pollution makes to the indoor environment through natural and mechanical ventilation. We recognize this important relationship, and have modified the principles outlined in the final report to more fully make this connection. Moreover, the Office of Air and Radiation at EPA has recently begun an air toxics pilot project in the City of Cleveland to take an integrated look at both the outdoor and indoor sources of air toxics, given the strong interrelationship between outdoor and indoor air. When this pilot is successfully completed, EPA hopes to replicate it in other urban areas across the country.

A number of commentors wanted us to more explicitly recognize that combinations of pollutants (i.e., mixtures) may also be responsible for poor indoor environmental quality. We agree with this; the draft report specifically recognizes the dearth of research on mixtures and calls for such research as part of any cross-Agency research strategy in the "Potential Actions" section associated with Goal 1.

Some commentors wanted us to add much more specificity to the “Potential Actions” section. For example, some commentors wanted us to specify particular building types, and, for each type, detail associated actions. We intentionally avoided this type of approach because certain universal needs exist across all building types. For example, under Goal 2, generating good cost/benefit data, creating integrated designs, marketing attractive incentives, and promoting good IEQ standards are common to all building types.

A number of commentors expressed concern that there were not more distinct references in the draft report to the importance of ventilation to good IEQ. We agree with the commentors on the importance of adequate ventilation and good IEQ. While not explicitly addressed in many places in the draft, we believe that ventilation issues will be addressed by several of the potential action areas. For example, ventilation issues will be captured in “risk management research” under Goal 1, and are an integral part of “excellent IEQ standards of care” under Goal 3. However, we have made several changes in the final report to more specifically recognize the important link between ventilation and IEQ.

Finally, some commentors pointed out that a section was needed to address the legislative and regulatory (including building code) changes that will be necessary to realize the goals outlined in the draft report. We acknowledge that many approaches, voluntary, as well as regulatory, will be needed in order to achieve healthier indoor environments. Those who embrace the vision and goals of the HBHP report will need to decide the most effective approach to implement the potential actions identified.